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March 1, 2022

BY ECF

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Edward Porrata v. City of New York, et al., 16 Civ. 7162 (PGG)

Your Honor:

I am an Assistant Corporation Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney assigned to represent defendant City of New York ("City") in the above-referenced matter. Defendant City writes to respectfully request that the Court adjourn the status conference currently scheduled for March 3, 2022 at 12:00 PM to a date after April 15, 2022. This is defendant City's first such request. Plaintiff's counsel, Stuart Shaw, consents to this request.

By way of background, on August 27, 2021, the Court ordered that a status conference be held on November 4, 2021, upon the completion of discovery on November 1, 2021. (ECF No. 36). Thereafter, the parties requested extensions of time to complete discovery on October 29, 2021 and December 13, 2021. (ECF Nos. 37 and 39). The Court granted the requests for an extension of time and simultaneously adjourned the status conference to December 16, 2021 and March 3, 2022, respectively. (ECF Nos. 38 and 40). On February 24, 2022, the Court granted the parties' third request for an extension of time to complete discovery and ordered that discovery be completed by April 15, 2022. (ECF No. 43). The Court's order, however, did not address the March 3, 2022 status conference. Accordingly, defendant City respectfully requests an adjournment of

the March 3, 2022 conference to a date and time convenient to the Court after April 15, 2022, upon the completion of discovery.

Thank you for your consideration herein.

Respectfully submitted,


/s/ Andrea Cagood

Assistant Corporation Counsel
Special Federal Litigation Division

cc: By ECF
Stuart R. Shaw
Attorney for plaintiff

Memo Endorsed: The conference currently scheduled for March 3, 2022 is adjourned to April 28, 2022 at 10:15 a.m.
Dated: March 1, 2022

SO ORDERED.



Paul G. Gardephe
United States District Judge